Oregon
Theodore Kulongoski, Governor

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February 16, 2006

Mr. Tom McCue, Environmental Manager
Siltronic Corporation
7200 NW Front Avenue
Portland, OR 97210

Re: Source Control Evaluation
Siltronic Corporation
Portland, Oregon
ECSI No. 183

Dear Mr. McCue:

On February 1, 2006 the U.S. Environmental Protection Agency (EPA) and Oregon Department of Environmental Quality (DEQ) met with representatives of Siltronic Corporation (Siltronic) to discuss the "Draft Source Control Alternatives Work Plan, Siltronic Corporation" dated January 3, 2006 (the Draft SCA Work Plan). The Draft SCA Work Plan was prepared on behalf of Siltronic by Maul Foster & Alongi, Inc. (MFA).

The Draft SCA Work Plan was prepared based on the results of uplands and in-river remedial investigation work that show: 1) releases of trichloroethene (TCE) and its degradation products from a former underground storage tank system (USTS) have contaminated groundwater; 2) groundwater is a complete pathway from the area of the release to the river; and 3) TCE and its degradation products are present in transition zone water immediately beneath the river at concentrations that exceed relevant screening criteria. Furthermore, during in-river work conducted in the summer of 2005 an area of sediments highly contaminated by TCE was discovered (i.e., Area 2). These contaminated sediments do not appear to be related to the groundwater plume originating from the former USTS.

Based on the information summarized above and consistent with DEQ Order No. VC-NWR-03-16, Siltronic is proceeding with a source control evaluation of unpermitted discharges and/or releases of TCE and its degradation products to the Willamette River.

The Draft SCA Work Plan provides Siltronic's recommended source control technology (i.e., enhanced bioremediation) and proposed approach for implementing uplands and in-water source control, including a projected schedule for design, implementation, and agency review and comment. Siltronic's initial source control technology screening was attached. In response to DEQ's comments on the Supplemental Investigation Report[1], the work plan also provided a review of available subsurface data collected near the 24-inch storm water conveyance pipe(s) that runs from the vicinity of the former USTS into the river.

The purpose of the meeting was for the EPA and DEQ to provide Siltronic input on the work plan. A significant outcome of the meeting discussions was that Siltronic's projected schedule for implementing in-water source control measures was considered unrealistic given the regulatory and administrative requirements for conducting the work (e.g., negotiation of an agreement with EPA; the number of local, state, and federal stakeholders interested and involved in the review and comment process; and in-river permitting

[1] Maul Foster & Alongi, Inc., 2005, "Supplemental Investigation Report, Siltronic Corporation Facility, 7200 NW Front Avenue, Portland, Oregon," September 8, a report prepared for Siltronic Corporation.

requirements). DEQ also informed Siltronic that the Draft SCA Work Plan would need to be revised and resubmitted before being approved by either of the two agencies.

EPA and DEQ understand from meeting discussions that the projected schedule for implementing source control measures is a significant consideration for Siltronic. Based on this information and Siltronic's commitment to moving forward with source control, EPA and DEQ agreed that:

- Evaluation of uplands source control measures should proceed independently of the in-water work.
- The initial focus of the source control evaluation will be to mitigate migration of TCE and its degradation products from the USTS into the river (i.e., uplands source control near the shoreline).
- Bench-scale test results preliminarily suggest enhanced bioremediation is a source control alternative that merits additional assessment.
- Siltronic should proceed with developing a work plan for designing and implementing a field pilot study to evaluate the performance and effectiveness of enhanced bioremediation as an uplands source control measure.

Given that the direction of source control work efforts will shift to evaluating enhanced bioremediation, there was general agreement that it was unnecessary for DEQ and EPA to review and comment on the Draft SCA Work Plan at this time.

DEQ appreciates Siltronic's ongoing efforts to evaluate uplands and in-river contamination associated with releases from the facility, and recommends that as soon as practicable arrangements are made for Siltronic and DEQ to discuss the conceptual design, goals, and objectives of the pilot study. The meeting will also provide an opportunity to discuss the scope of work for further evaluating the storm water conveyance system as a potential source of Area 2 sediment contamination.

Please don't hesitate to contact me if you have any questions regarding this letter, or if you're understanding of the February 1st meeting discussions and agreements are not consistent with those summarized above.

Sincerely,

Dana Bayuk, R.G.
Project Manager
Cleanup & Lower Willamette Section

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